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**April 15, 2025**

**Via ECF**

Hon. Jesse M. Furman, USDJ  
United States District Court, SDNY  
40 Foley Square  
New York, NY 10007

**Re: Simoni v. The First Rate Group LLC et al**  
**Case No. 24-CV-05784 (JMF)(RWL)**  
**Response to ECF No. 39 to 42, etc.**

Dear Judge Furman:

My firm represents plaintiff in the above-referenced action, and I respectfully write in response to the motion of Defendant Quality Concierge Services Inc at ECF Nos. 39-42. Said motion seeks to invoke a collective bargaining agreement to compel mediation through the union. Without agreeing the points and arguments set forth in the motion, we are not opposed to the Court staying this case and referring it to the mediation process set forth in the CBA – the claims against the other Defendants The First Rate Group LLC and First Rate Maintenance LLC were already resolved through settlement that was approved by the Court. (See ECF No. 35).

By way of clarification, Plaintiff is not consenting to arbitration and is only consenting to union mediation requested in the notice of motion.

I thank the Court in advance for its time and consideration.

Respectfully submitted,

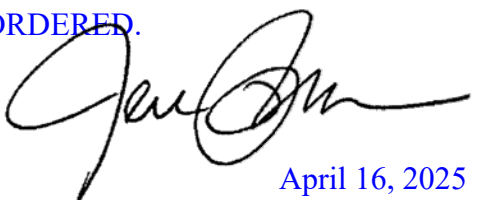
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/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**cc: Defense Counsel via ECF**

Defendant's motion to compel mediation pursuant to the collective bargaining agreement, *see* ECF No. 39, is hereby GRANTED as unopposed. The case is hereby STAYED pending the mediation and the pretrial conference currently scheduled for April 30, 2025, is hereby ADJOURNED *sine die*. The parties shall file a joint letter updating the Court on the status of mediation no later than **July 15, 2025**. The Clerk of Court is directed to terminate ECF No. 39.

**SO ORDERED.**



**April 16, 2025**